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August 15, 2012

By ECF & Facsimile

The Honorable Carol Bagley Amon
Chief United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States vs. Anthony Romanello
12 Cr. 50 (S-6) (CBA)

Dear Chief Judge Amon:

I write to apprise the Court of the status of my scheduled trials and to request a brief extension of time to respond to the government motions *in limine*.

Trial Schedule

At the status conference on July 24, 2012, Your Honor set two alternative trial dates for this matter:

- 1) September 17th, with jury selection on September 10th, if my Staten Island homicide trial (*People v. Ardjent Shaini*, Judge Stephen Rooney) was **not** going to go forward as scheduled on September 7th; **or**
- 2) October 22nd, if the Staten Island homicide trial was going forward.

The *Shaini* murder case (pending since 2010) is definitely going forward on September 7th. Justice Rooney just filed an order deciding all outstanding pretrial motions, and the People (Assistant District Attorney Mark Palladino) and the defense are ready.

Government Motions in Limine

At the status conference on July 24th, and in anticipation of an early September trial date, Your Honor set a date of August 13th for the defense to respond to the already-filed, and to-be-filed, government motions *in limine*.

GERALD J. MCMAHON

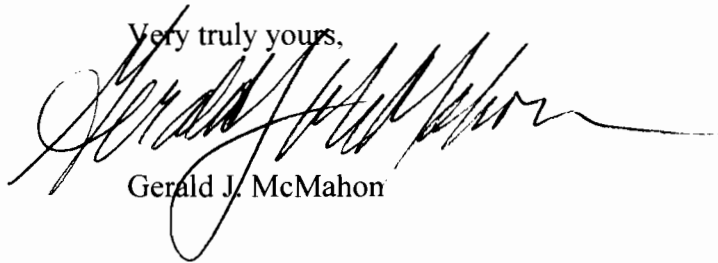
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Since it now appears likely that trial of this matter will commence on October 22nd, the defense requests an extension of time to August 27th to respond to the government motions.

Mrs. Romanello's Surgery

Defendant's wife underwent surgery on August 7th and the operation was, by all accounts, successful. The Romanello family is very much appreciative of the Court's consideration in moving the original trial date.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Gerald J. McMahon', with a long horizontal flourish extending to the right.

Gerald J. McMahon

GJM:cw
cc: All Counsel
(by ECF)